

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

FIREMAN'S FUND INSURANCE : CIVIL ACTION NO.:  
COMPANY : 04-11578 PBS  
:  
v. :  
:  
FIRE SYSTEMS, INC.; :  
FIRE SUPPRESSION SYSTEMS OF :  
NEW ENGLAND, INC.; :  
PRO CON, INC. :  
and :  
PAQUETTE ELECTRIC COMPANY, INC.:  
Defendants : AUGUST 29, 2006

## PLAINTIFF'S OBJECTIONS TO DEFENDANTS' PRETRIAL DISCLOSURES

### A. OBJECTION TO DEFENDANT PAQUETTE ELECTRIC'S DISCLOSURES

The Plaintiff, Fireman's Fund Insurance Company, hereby objects to Defendant Paquette Electric's disclosures in their entirety. The Court's "Order Setting Case For Trial", filed on June 1, 2006, required that the parties' pretrial disclosures be filed and disclosed to the other parties ***no later than August 19, 2006***. August 19, 2006 fell on a Saturday, which allowed for filing and disclosure on the following Monday, August 21, 2006. The Defendant Paquette Electric did not file its disclosures until Wednesday, August 23, 2006. This late disclosure is in violation of the Court's pretrial orders and should be stricken in its entirety.

## B. OBJECTION TO DEFENDANT FIRE SUPPRESSION SYSTEMS' DISCLOSURES

The Plaintiff, Fireman's Fund Insurance Company, hereby objects to Defendant Fire Suppression System's disclosures dated August 25, 2006, in so much as they contain information additional to the disclosures made by Fire Suppression Systems dated August 21, 2006. The Court's "Order Setting Case For Trial", filed on June 1, 2006, required that the parties' pretrial disclosures be filed and disclosed to the other parties ***no later than August 19, 2006***. August 19, 2006 fell on a Saturday, which allowed for filing and disclosure on the following Monday, August 21, 2006. The Defendant Fire Suppression Systems filed its disclosure on August 21, 2006 in a timely manner, but has attempted to add additional witnesses and exhibits in a

disclosure dated August 25, 2006. This late disclosure is in violation of the Court's pretrial orders and should be stricken with respect to any information that is additional to the disclosure dated August 21, 2006.

**C. OBJECTION TO DEFENDANT PRO-CON, INC.'S DISCLOSURES**

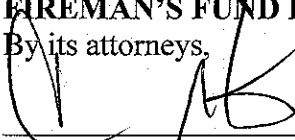
No objection.

**D. OBJECTION TO DEFENDANT FIRE SYSTEMS, INC.'S DISCLOSURES**

No objection.

**FIREMAN'S FUND INSURANCE COMPANY**

By its attorneys,



Erik Loftus, Esquire (BBO# 656315)  
Law Offices of Stuart G. Blackburn  
Two Concorde Way  
P.O. Box 608  
Windsor Locks, CT 06096  
(860) 292-1116

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CERTIFICATE OF SERVICE

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FIREMAN'S FUND INSURANCE	:	CIVIL ACTION NO.:
COMPANY	:	04-11578 PBS
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	:	
FIRE SYSTEMS, INC.;	:	
FIRE SUPPRESSION SYSTEMS OF	:	
NEW ENGLAND, INC.;	:	
PRO CON, INC.	:	
and	:	
PAQUETTE ELECTRIC COMPANY, INC.	:	
Defendants	:	AUGUST 29, 2006
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I hereby certify that on **August 29, 2006**, a copy of foregoing **PLAINTIFF'S OBJECTIONS TO DEFENDANT'S PRETRIAL DISCLOSURES** was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Erik Loftus, Esq.  
Erik Loftus, Esquire (BBO# 656315)  
Law Offices of Stuart G. Blackburn  
Two Concorde Way  
P.O. Box 608  
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